

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

LEXINGTON INSURANCE COMPANY and
NATIONAL UNION FIRE INSURANCE
COMPANY OF PITTSBURGH,

Plaintiffs,

v.

VIRGINIA SURETY COMPANY, INC.

Defendant.

CIVIL ACTION NO. 04-11109 RGS

**AFFIDAVIT OF NICHOLAS C. CRAMB ESQ. IN SUPPORT OF
DEFENDANT VIRGINIA SURETY COMPANY'S MOTION
FOR RECONSIDERATION OF ORDER DENYING THE PARTIES' JOINT
MOTION FOR EXTENSION OF TIME TO COMPLETE DISCOVERY**

I, Nicholas C. Cramb, Esq. hereby depose and state as follows:

1. I have personal knowledge of the facts in this affidavit.
2. I am submitting this affidavit in support of Defendant Virginia Surety Company's

Emergency Motion for Reconsideration of Order Denying the Parties' Joint Motion For
Extension of Time to Complete Discovery.

3. Attached hereto as Exhibit A is a true and accurate copy of a letter that I sent to
Plaintiffs' counsel on March 15, 2006, enclosing for service Fed. R. Civ. P. 30(b)(6) Deposition
Notices of the Plaintiffs.

4. Attached hereto as Exhibit B is a true and accurate copy of an article from the
New Jersey Office of the Attorney General Website,
<http://www.state.nj.us/lps/dcj/njinsurancefraud/report/2004/OIFP-AR-sec.5-p44.pdf>, as printed
on April 2, 2006.

Signed under the pains and penalties of perjury.

Date April 5, 2006

/s/ Nicholas C. Cramb
Nicholas C. Cramb, Esq.

Respectfully submitted,

VIRGINIA SURETY COMPANY, INC.

By its attorneys,

/s/ Nicholas C. Cramb
Joseph G. Blute (BBO# 047300)
John M. Stephan (BBO# 649509)
Nicholas C. Cramb (BBO# 654368)
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Certificate of Service

I, Nicholas C. Cramb, hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non registered participants on April 5, 2006.

/s/ Nicholas C. Cramb

Dated: April 5, 2006